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*By Stephen Bond at 4:59 pm, Mar 04, 2021*

2018R01353/FAL

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Brian R. Martinotti
	:	
	:	
v.	:	Criminal No. 20-185
	:	
WYZIER PETERSON,	:	21 U.S.C. § 846
a/k/a "Trap,"	:	21 U.S.C. §§ 841 (a)(1) and (b)(1)(B)
CARL BROWN,	:	21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
a/k/a "C Dub,"	:	18 U.S.C § 922(g)(1)
a/k/a "Dub,"	:	18 U.S.C. § 924(c)(1)(A)(i)
AARYN ABRAMS,	:	18 U.S.C. § 2
a/k/a "AI,"	:	
NAJIER BOONE,	:	
a/k/a "Bebe,"	:	
ZIKEME BROOKS,	:	
a/k/a "Zeek,"	:	
a/k/a "Ace,"	:	
JIMIR RICKS,	:	
a/k/a "40,"	:	
a/k/a "Red,"	:	
DAVINE CAMPBELL,	:	
a/k/a "D," and	:	
DASHION KELSON,	:	
a/k/a "Tank,"	:	
a/k/a "Izzy,"	:	
a/k/a "Stizzy"	:	

**THIRD SUPERSEDING INDICTMENT**

The Grand Jury in and for the District of New Jersey, sitting at Newark,  
charges:

**COUNT ONE**  
*(Drug Conspiracy)*

From at least on or about September 1, 2018 through on or about October 3, 2019, in Passaic County, in the District of New Jersey, and elsewhere, the defendants,

**WYZIER PETERSON,**  
a/k/a “Trap,”  
**CARL BROWN,**  
a/k/a “C Dub,”  
a/k/a “Dub,”  
**AARYN ABRAMS,**  
a/k/a “AI,”  
**NAJIER BOONE,**  
a/k/a “Bebe,”  
**ZIKEME BROOKS,**  
a/k/a “Zeek,”  
a/k/a “Ace,”  
**JIMIR RICKS,**  
a/k/a “40,”  
a/k/a “Red,”  
**DAVINE CAMPBELL,**  
a/k/a “D,” and  
**DASHION KELSON,**  
a/k/a “Tank,”  
a/k/a “Izzy,”  
a/k/a “Stizzy,”

did knowingly and intentionally conspire and agree with each other and others, known and unknown, to distribute and possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, (N-phenyl-N-[1-(2-

phenylethyl)-4-piperidiny] Propanamide), a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1), (b)(1)(B), and (b)(1)(C).

In violation of Title 21, United States Code, Section 846.

**COUNT TWO**

*(Distribution of Heroin and Fentanyl)*

On or about November 21, 2018, in Passaic County, in the District of New Jersey, the defendants,

**WYZIER PETERSON,  
a/k/a “Trap,” and  
JIMIR RICKS,  
a/k/a “40,”  
a/k/a “Red,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT THREE**  
*(Distribution of Heroin)*

On or about January 23, 2019, in Passaic County, in the District of New Jersey, the defendants,

**CARL BROWN,  
a/k/a “C Dub,”  
a/k/a “Dub,” and  
NAJIER BOONE,  
a/k/a “Bebe,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT FOUR**

*(Distribution of Heroin and Fentanyl)*

On or about June 30, 2019, in Passaic County, in the District of New Jersey, the defendant,

**WYZIER PETERSON,  
a/k/a “Trap,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, and death resulted from the use of such substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT FIVE**

*(Distribution of Heroin)*

On or about July 3, 2019, in Passaic County, in the District of New Jersey, the defendant,

**WYZIER PETERSON,  
a/k/a “Trap,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNTS SIX THROUGH FOURTEEN**  
*(Distribution of Controlled Substances)*

On or about the dates set forth in the chart below, in Passaic County, in the District of New Jersey, the defendant,

**JIMIR RICKS,**  
**a/k/a “40,”**  
**a/k/a “Red,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, as set forth in the following chart.



<b>COUNT</b>	<b>DATE</b>	<b>CONTROLLED SUBSTANCE(S)</b>
6	December 3, 2018	Heroin and fentanyl
7	January 29, 2019	Heroin
8	February 6, 2019	Heroin
9	February 11, 2019	Heroin and fentanyl
10	February 19, 2019	Heroin and fentanyl
11	February 25, 2019	Heroin and fentanyl
12	March 6, 2019	Heroin and fentanyl
13	April 16, 2019	Heroin and fentanyl
14	May 17, 2019	Heroin and fentanyl

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNT FIFTEEN**

*(Distribution of Heroin and Fentanyl)*

On or about March 11, 2019, in Passaic County, in the District of New Jersey, the defendants,

**AARYN ABRAMS,  
a/k/a “AI,” and  
JIMIR RICKS,  
a/k/a “40,”  
a/k/a “Red,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

**COUNTS SIXTEEN THROUGH EIGHTEEN***(Distribution of Controlled Substances)*

On or about the dates set forth in the chart below, in Passaic County, in the District of New Jersey, the defendant,

**AARYN ABRAMS,**  
**a/k/a “AI,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, as set forth in the chart below.

<b>COUNT</b>	<b>DATE</b>	<b>CONTROLLED SUBSTANCE(S)</b>
16	January 17, 2019	Heroin
17	May 2, 2019	Heroin and fentanyl
18	May 23, 2019	Heroin and fentanyl

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNTS NINETEEN THROUGH TWENTY-FOUR***(Distribution of Controlled Substances)*

On or about the dates set forth in the chart below, in Passaic County, in the District of New Jersey, the defendant,

**NAJIER BOONE,**  
**a/k/a “Bebe,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, as set forth in the chart below.

<b>COUNT</b>	<b>DATE</b>	<b>CONTROLLED SUBSTANCE(S)</b>
19	January 31, 2019	Heroin
20	February 7, 2019	Heroin
21	February 14, 2019	Heroin
22	February 21, 2019	Heroin and fentanyl
23	February 28, 2019	Heroin and fentanyl
24	March 14, 2019	Fentanyl

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-FIVE**  
*(Distribution of Heroin and Fentanyl)*

On or about July 17, 2019, in Passaic County, in the District of New Jersey, the defendant,

**ZIKEME BROOKS,**  
**a/k/a “Zeek,”**  
**a/k/a “Ace,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-SIX**  
*(Distribution of Cocaine Base)*

On or about September 5, 2019, in Passaic County, in the District of New Jersey, the defendants,

**NAJIER BOONE,  
a/k/a “Bebe,” and  
DAVINE CAMPBELL,  
a/k/a “D,”**

did knowingly and intentionally distribute 28 grams or more of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B) and Title 18, United States Code, Section 2.

**COUNT TWENTY-SEVEN**

*(Possession with Intent to Distribute Heroin, Fentanyl, and Cocaine Base)*

On or about October 3, 2019, in Passaic County, in the District of New Jersey, the defendant,

**AARYN ABRAMS,**  
**a/k/a “AI,”**

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, and a quantity of a mixture and substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT TWENTY-EIGHT**

*(Use of a Firearm in Furtherance of a Drug Trafficking Crime)*

On or about October 3, 2019, in Passaic County, in the District of New Jersey, the defendant,

**AARYN ABRAMS,**  
**a/k/a “AI,”**

in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute heroin, fentanyl, and cocaine base, charged in Count Twenty-Seven of this Third Superseding Indictment, did knowingly possess, use, and carry a firearm.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).



**COUNT TWENTY-NINE**

*(Possession of a Firearm by a Convicted Felon)*

On or about October 3, 2019, in Passaic County, in the District of New Jersey, the defendant,

**AARYN ABRAMS,**  
**a/k/a “AI,”**

knowing that he had been previously convicted in a court of at least one crime punishable by a term of imprisonment exceeding one year, did knowingly possess in and affecting commerce a firearm, namely, a 9mm Taurus pistol, bearing serial number TJT93144, and seven rounds of 9 mm ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNTS THIRTY THROUGH THIRTY-FIVE***(Distribution of Controlled Substances)*

On or about the dates set forth in the chart below, in Passaic County, in the District of New Jersey, the defendant,

**DASHION KELSON,**  
**a/k/a “Tank,”**  
**a/k/a “Izzy,”**  
**a/k/a “Stizzy,”**

did knowingly and intentionally distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, and fentanyl, (N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] Propanamide), a Schedule II controlled substance, as set forth in the chart below.

<b>COUNT</b>	<b>DATE</b>	<b>CONTROLLED SUBSTANCE(S)</b>
30	December 5, 2018	Heroin and fentanyl
31	December 17, 2018	Heroin and fentanyl
32	January 9, 2019	Heroin and fentanyl
33	January 16, 2019	Heroin
34	February 21, 2019	Heroin
35	February 28, 2019	Heroin and fentanyl

All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**COUNT THIRTY-SIX**

*(Possession with Intent to Distribute Heroin)*

On or about October 3, 2019, in Passaic County, in the District of New Jersey, the defendant,

**DASHION KELSON,**

**a/k/a “Tank,”**

**a/k/a “Izzy,”**

**a/k/a “Stizzy,”**

did knowingly and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

**COUNT THIRTY-SEVEN**

*(Possession with Intent to Distribute Heroin)*

On or about October 3, 2019, in Passaic County, in the District of New Jersey, the defendant,

**DASHION KELSON,  
a/k/a “Tank,”  
a/k/a “Izzy,”  
a/k/a “Stizzy,”**

did knowingly and intentionally possess with intent to distribute a quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

**FORFEITURE ALLEGATIONS**

1. The allegations set forth in Counts One through Twenty-Seven and Thirty through Thirty-Seven of this Third Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. Pursuant to Title 21, United States Code, Section 853, upon conviction of the controlled substance offenses alleged in Counts One through Twenty-Seven and Thirty through Thirty-Seven of this Third Superseding Indictment, the defendants,

**WYZIER PETERSON,**  
a/k/a "Trap,"  
**CARL BROWN,**  
a/k/a "C Dub,"  
a/k/a "Dub,"  
**AARYN ABRAMS,**  
a/k/a "AI,"  
**NAJIER BOONE,**  
a/k/a "Bebe,"  
**ZIKEME BROOKS,**  
a/k/a "Zeek,"  
a/k/a "Ace," and  
**JIMIR RICKS,**  
a/k/a "40,"  
a/k/a "Red,"  
**DAVINE CAMPBELL,**  
a/k/a "D," and  
**DASHION KELSON,**  
a/k/a "Tank,"  
a/k/a "Izzy,"  
a/k/a "Stizzy,"

shall forfeit to the United States of America any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of these offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of these offenses.

3. The allegations set forth in Counts Twenty-Eight and Twenty-Nine of this Third Superseding Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

4. Upon conviction of violating Title 18, United States Code, Section 924(c)(1)(A)(i), as charged in Count Twenty-Eight of this Third Superseding Indictment, and Title 18, United States Code, Section 922(g)(1), as charged in Count Twenty-Nine of this Third Superseding Indictment, the defendant,

**AARYN ABRAMS,**  
**a/k/a "AI,"**

shall forfeit to the United States any firearm and ammunition involved in or used in the commission of such offenses, including but not limited to the following:

- (1) One 9mm Taurus pistol, bearing serial number TJT93144;
- (2) Seven rounds of 9mm ammunition recovered on or about October 3, 2019 from the 9mm Taurus pistol, bearing serial number TJT93144.

**SUBSTITUTE ASSETS PROVISION**

If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to Title 21, United States Code, Section 853(p), to the forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A TRUE BILL,



FOREPERSON

  
RACHAEL A. HONIG  
Acting United States Attorney

CASE NUMBER: 20-185 (BRM)

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**United States District Court  
District of New Jersey**

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**UNITED STATES OF AMERICA**

**v.**

**WYZIER PETERSON, a/k/a "Trap,"  
CARL BROWN, a/k/a "C Dub," a/k/a "Dub,"  
AARYN ABRAMS, a/k/a "AI,"  
NAJIER BOONE, a/k/a "Bebe,"  
ZIKEME BROOKS, a/k/a "Zeek," a/k/a "Ace,"  
JIMIR RICKS, a/k/a "40," a/k/a "Red,"  
DAVINE CAMPBELL, a/k/a "D," and  
DASHION KELSON, a/k/a "Tank," a/k/a "Izzy," a/k/a "Stizzy"**

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**THIRD SUPERSEDING INDICTMENT  
FOR**

**21 U.S.C. § 846  
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)  
18 U.S.C. § 924(c)(1)(A)(i)  
18 U.S.C. § 922(g)(1)  
18 U.S.C. § 2**

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**A True Bill,**

  
**Foreperson**

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**RACHAEL A. HONIG**  
*ACTING UNITED STATES ATTORNEY  
NEWARK, NEW JERSEY*

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**FRANCESCA LIQUORI**  
*ASSISTANT U.S. ATTORNEY  
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